



Department of Ecology
Water Quality Program
SEP 22 2005

PORT GAMBLE S'KLALLAM TRIBE

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September 15, 2005

Western Washington Municipal Stormwater Permit

Bill Moore

WA Department of Ecology

Water Quality Program

PO Box 47600

Olympia, WA 98504-47600

RE: NPDES Phase II Municipal Stormwater Permit Comments

Thank you for the opportunity to comments on the draft proposed municipal stormwater NPDES phase II general permit for western Washington. In general, we support the current draft permit and commend Ecology for its efforts. The Tribe supports the use of the 2005 Stormwater Management Manual for Western Washington as the minimum technical standard for new development and redevelopment. However, we concur with concerns about the rule raised by the Puget Sound Action Team, Puget Soundkeeper, and People for Puget Sound in recent communications with the department.

At this time, our specific comments focus on the permit coverage area. Several urban areas within the Tribes' shared usual-and-accustomed area should be covered but currently are not under this rule. The July 2004 draft designation criteria appear to qualify the cities of Port Townsend and Sequim, and the Belfair urban growth area for coverage under the NPDES phase II stormwater permit.

The rapidly-expanding city of Sequim has stormwater discharges to the Dungeness River and Sequim Bay, which both contain threatened shellfish growing areas. Dungeness River and Bay serve as critical habitat for ESA-threatened Puget Sound chinook and eastern Strait of Juan de Fuca summer chum salmon.

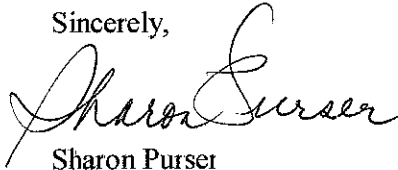
The City of Port Townsend has an extensive marine shoreline that fronts on Port Townsend Bay, an important shellfish gathering area for Tribal and recreational fisherman. In addition, the City's shorelines are an important migratory pathway for threatened salmon entering and leaving Puget Sound.

Lastly, the Belfair urban growth area has stormwater impacts to both the Union River and lower Hood Canal. These impacts have been well documented in the Union River TMDL monitoring, and have resulted in shellfish growing area closures and contributed to low dissolved oxygen problems in lower Hood Canal. The Union River and adjacent Hood Canal shorelines serve as critical habitat for ESA-threatened Hood Canal summer chum salmon, and Hood Canal is designated a "shoreline of state-wide significance" under the 1971 Washington State shoreline management act.

Each of these areas has rapid population growth, and the City of Port Townsend is projected to have a population greater than 10,000 by the time of the next census. Thus, we feel that these communities meet the department's criteria for regulation under the NPDES phase II stormwater general permit.

Thank you for the opportunity to comment on the draft permit. If you have questions on these comments, please contact Ted Labbe, habitat biologist at 360-297-6289 or tlabbe@pgst.nsn.us.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sharon Purser".

Sharon Purser
Natural Resources Director